REMARKS

Reconsideration and allowance of the present application are respectfully requested. Claims 1-2, 4-15, 17-19, and 30-34 are currently pending in this application.

RCE Filed Concurrently Herewith

The Patent Office is advised that the present Response is accompanied by a Request for Continued Examination (RCE). The RCE ensures entry of this paper in response to the Final Office Action dated January 19, 2006.

Regarding the 35 U.S.C. § 102 Rejection

Claims 1-19 and 30-34 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Published Patent Application No. 2004/0039993 to Kougiouris et al. (referred to below as Kougiouris for brevity). Applicant respectfully traverses this rejection for the following reasons.

Kougiouris discloses a system and method for automatically performing validation procedures and/or formatting procedures for a graphical user interface (GUI) described in a markup language file (see paragraph No. 10). The validation/formatting procedures may be managed by an executable component referred to as a "validation/formatting manager component" (see paragraph No. 13). The validation/formatting manager component is operable to perform validation/formatting for GUI elements based on custom markup language attributes (see paragraph No. 14).

Kougiouris does not anticipate any of the claims. To begin with, consider independent claim 1, as reproduced below in its entirety (with emphasis):

1. A method comprising:

accessing a computer program;

automatically identifying a set of one or more attributes of the computer program

with values that are to be input to the computer program by a user; and

creating code for one or more forms including selected ones of the set of one or

more attributes.

Kougiouris does not disclose the above-identified method at least because Kougiouris does not disclose automatically identifying a set of one or more attributes of a computer program with values that are to be input to the computer program by a user, and creating code for one or more forms including selected ones of the set of one or more attributes (in the context of the claim when read as a whole).

In addressing this claim, the Office Action states, in part:

> With respect to claim 1, Applicant argues Kougiouris does not teach 'creating one or more forms including selected ones of the set of one or more attributes' as amended. Examiner respectfully disagrees. Kougiouris discloses that Graphical user interfaces (GUIs) often include text fields for accepting text input or displaying text output. For example, graphical user interfaces may comprise a 'form', that is a series of text fields with a look and feel similar to a paper-based form. Many text fields are designed to accept text input or display text output that is often formatted or demarcated in a particular way.
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> . . .
>
> Applicant argues that Kougiouris discusses an application program displays a GUI in a markup language file and does not create a GUI or a markup language file. Examiner disagrees because a form is simply formatted document containing blank fields that users can

fill in with data which is exactly what Kougiouris teaches as stated above. (See paragraph No. 5 on pages 7 and 8 of the Final Office Action.)

The essence of this position appears to be that Kougiouris discloses displaying a form and therefore meets the features recited in claim 1. But merely displaying a form in the course of the execution of a computer program does not satisfy what is being recited in claim 1. Amended claim 1 recites, in part, "creating code for one or more forms including selected ones of the set of one or more attributes." The act of displaying a form does not *create the code* for a form, but, at best, executes existing code that describes the form.

For at least the above-stated reason, Kougiouris does not disclose the subject matter of claim 1.

Consider next independent claim 11, as reproduced below in its entirety (with emphasis):

11. A method comprising:

accessing a computer program, wherein the computer program includes a plurality of interactions that each include one or more command definitions and one or more view definitions, wherein each command definition defines a command having various attributes and a behavior, and wherein each view definition defines a view that is a response to a request; and

automatically identifying a set of one or more attributes of the computer program with values that are to be input to the computer program by a user wherein the automatically identifying comprises,

identifying, for each of the command definitions of each of the plurality of interactions, the methods of the command definition,

checking, for each identified method that sets a value, whether a corresponding identified method obtains the value, and

identifying, as an attribute of the set of one or more attributes, each attribute corresponding to a method that sets a value for the attribute for which there is no corresponding identified method that obtains the value for the attribute; and

outputting an identification of the set of one or more attributes.

Kougiouris does not disclose the above-identified method at least because Kougiouris does not disclose checking, for each identified method that sets a value, whether a corresponding identified method obtains the value (in the context of the claim when read as a whole).

In addressing claim 11, the Office Action states, in part:

Kougiouris discloses the user may provide text input to the GUI element which is validated by the manager before it is displayed in HTML form. See page 5, paragraph [0070]-[0075]. See also figures 5A-5C which illustrate a data input field for inputting a value for the attributes. The user may also perform various other actions causing the application to check the text, such as issuing a command to submit the data the user has entered to a database, or perform other types of transactions using the data. See page 8, paragraph [0125]. Kougiouris discloses outputting the attributes in a form such as an HTML form in which the various attributes are listed. See figures 5A-5C. (See paragraph No. 5 of the Final Office Action, page 8).

In providing this analysis, the Patent Office appears to be conflating the validating operation that Kougiouris performs with the above-described "checking" operation. However, Kougiouris' validation operation provides a mechanism for comparing user input against predetermined expectations regarding proper (i.e., valid) input. This does not pertain to what is being recited in claim 1, namely, checking, for each identified method that sets a value, whether a corresponding identified method obtains the value. In other words, the checking of claim 11 concerns a specific correspondence among methods of a computer program, *not* a comparison between text received by a user and predetermined expectations regarding the proper form of this text.

For at least the above-stated reason, Kougiouris does not disclose the subject matter of claim 11.

Consider next independent claim 14, as reproduced below in its entirety (with emphasis):

14. A method comprising:

accessing a computer program;

automatically identifying a set of one or more outputs of the computer program;

generating a list identifying the set of one or more outputs; and

outputting the list,

wherein the identifying and generating are performed based on an analysis of computer program code, independent of execution of the computer program to provide one or more views.

Kougiouris does not disclose the method of claim 14 at least because Kougiouris does not disclose the above-identified accessing, identifying, generating, and outputting operations, wherein the identifying and generating are performed based on an analysis of computer program code, independent of execution of the computer program to provide one or more views (in the context of the claim when read as a whole).

In addressing claim 14, the Office Action states, in part:

With respect to claim 14, Applicant argues there is no generation of a list identifying a set of one or more outputs and outputting the list. Examiner respectfully disagrees. Kougiouris discloses outputting the attributes in a form such as an HTML form in which the various attributes are listed. See figures 5A-5C. Outputting the attributes in a form is 'outputting the list of outputs'. (See paragraph No. 5 of the Final Office Action, page 9).

In this passage, the Patent Office appears to conflate the mere display of a form with the generation of a list as recited in claim 14. However, generating a form reflects only the normal output of a computer program, not a list that is generated according to the method of claim 14. To clarify this distinction, claim 14 has been amended to recite that the identifying and generating are performed based on an analysis of computer program code, independent of the execution of the computer program to provide one or more views. In marked contrast, the forms discussed in Kougiouris as generated *in the course of execution of the program, not independent of such execution.*

For at least the above-stated reason, Kougiouris does not disclose the subject matter of claim 14.

The final independent claim, i.e., claim 30, recites features that are related to the subject matter of claim 1. Accordingly, Kougiouris fails to disclose the subject matter of claim 30 for reasons that are similar to those presented above with respect to claim 1.

The remaining claims depend variously from the above-identified independent claims. These claims are allowable for at least this reason. In addition, these claims recite additional subject matter which is not disclosed in or suggested by Kougiouris.

As stated in MPEP § 2131, "A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). As noted above, Kougiouris fails to disclose all of the elements in the independent claims. Accordingly, Kougiouris fails to anticipate any of the claims under 35 U.S.C. § 102.

For at least the above-identified reasons, the Applicant submits that the 35 U.S.C. § 102(e) rejection is misplaced, and therefore respectfully requests that it be withdrawn.

Cross-Reference to Related Applications

As a final matter, the Applicant informs the Patent Office that the following commonly-assigned applications were filed on the same date as the present application: 09/847,063; 09/845,752; 09/845,751; 09/847,035; 09/845,737; 09/845,780; 09/847,038; and 09/847,037.

Conclusion

The arguments presented above are not exhaustive; Applicant reserves the right to present additional arguments to fortify its position. Further, Applicant reserves the right to challenge the alleged prior art status of one or more documents cited in the Office Action.

In conclusion, all objections and rejections raised in the Office Action having been addressed, it is respectfully submitted that the present application is in condition for allowance and such allowance is respectfully solicited. The Examiner is urged to contact the undersigned if any issues remain unresolved by this Amendment.

Respectfully Submitted,

Dated: June 15, 2006   By: _____

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